

EXHIBIT F

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DENYONNA N. REED	§	CIVIL ACTION
	§	
Plaintiff,	§	
	§	
V.	§	COMPLAINT 5:22-cv-00068
	§	
I.Q. DATA INTERNATIONAL, INC.,	§	
	§	
Defendant.	§	

AFFIDAVIT OF DYLAN BASS

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Dylan Bass, known to me to be the person whose name is signed to this affidavit, and having been duly sworn, upon his oath, stated as follows:

1. My name is Dylan Bass, I am over the age of 18. I have never been convicted of a felony or a crime of moral turpitude, and I am otherwise fully competent to make this affidavit. All of the statements contained in this affidavit are true and correct and based upon my personal knowledge and experience.
2. I am currently employed as an associate attorney for Serpe Andrews, PLLC, the law firm that represents I.Q. Data International, Inc. ("IQ Data") in the above referenced matter. I am licensed to practice by the State Bar of Texas (Texas Bar No. 24129304); the State Bar of New Mexico (New Mexico Bar No. 161616); and the United States District Court for the Southern District of Texas (Federal Bar No. 3821202).
3. On October 25, 2023, I contacted the Lofts at Ventura to inquire whether Denyonna Reed ("Plaintiff") was denied housing at Ventura. Specifically, I contacted Cohen-Esrey, LLC as Ventura's website states that Ventura is a "Cohen-Esrey Community."¹ When I contacted Cohen-Esrey, I spoke to Ms. Alisha Brooks who informed me that she was a Regional Manager for Cohen-Esrey. During the phone conversation, Ms. Brooks informed me that Denyonna Reed applied for housing at the Lofts at Ventura on April 5, 2022, and

¹ <https://www.loftsatventura.com/>

EXHIBIT F

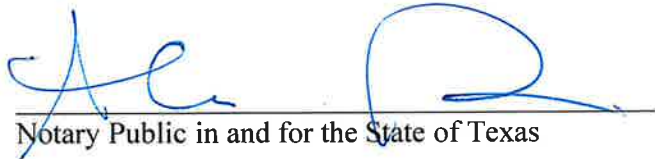
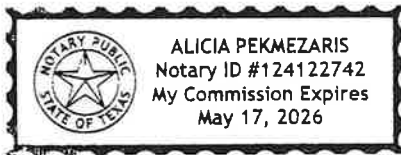
was subsequently approved, but that Ms. Reed later withdrew her application on September 14, 2022.

4. After my telephone conversation with Ms. Brooks, I sent Ms. Brooks an email memorializing the details of our conversation and I inquired as to whether Ms. Brooks was able to provide any documents showing that Ms. Reed was approved for housing at Ventura. Thereafter, Ms. Brooks responded confirming that the factual details in my email memorializing our prior phone conversation were correct. A true and correct copy of this email correspondence is attached to IQ Data's Motion to Compel as **Exhibit D**. Ms. Brooks also attached a "score card" to her email to show that Ms. Reed was not denied housing at Ventura. A true and correct copy of the score card is attached to IQ Data's Motion to Compel as **Exhibit E**.



Dylan Bass

SIGNED AND SWORN TO before me on this the 2nd day of November, 2023.



Notary Public in and for the State of Texas